

DOCKET FILE COPY ORIGINAL

November 26, 2005

VIA EMAIL

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

RE: E-911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196; IP Enabled Services, WC Docket No. 05-196

Dear Ms. Dortch:

I am writing on behalf of PuebloTel Communications, Inc. ("PuebloTel"), a provider of managed Voice over Internet Protocol ("VoIP") services on a retail basis to end-user subscribers. The purpose of this letter is to provide a compliance report on the status of PuebloTel's implementation of E-911 service, as required by the First Report and Order in the above-captioned proceedings, FCC 05-116, 20 FCC Rcd 10245 (released June 3, 2005) ("Order"); Public Notice, "Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters", WC Docket Nos. 04-36, 05-196, DA 05-2945 (released Nov. 7, 2005) ("Public Notice"). This letter provides background information about PuebloTel, and then responds to each of the specific information requests outlined in the *Public Notice*.

Background on PuebloTel

PuebloTel is a reseller of VoIP services to end-user subscribers. PuebloTel owns no VoIP network assets of its own. Instead, PuebloTel purchases VoIP services on a wholesale basis from New Global Telecom, Inc. ("NGT"), a leading provider of managed VoIP services on a *wholesale* basis. NGT has provided wholesale communications and information services since 1996. In 2003, NGT launched its first wholesale VoIP services, and in 2004, NGT launched a wholesale VoIP offering under the brand name "6DegreesIP™." PuebloTel is an early stage company that has less than 50 end-user subscribers as of November 27, 2005.

NGT's 6DegreesIP product suite includes: (1) the hosted application server with comprehensive feature sets for residential and enterprise segments of the market; (2) nationwide origination and worldwide termination; (3) direct inward dialing ("DID") numbers; (4) local number portability; (5) Directory Assistance, Directory Listing, and TRS services; (6) audio and web conferencing, including on-demand multi-party voice conferencing with optional web meeting and document sharing; (7) cross-border number assignment; (8) integrated OSS and billing functionality; (9) customer premise equipment ("CPE") support; (10) and marketing and training support.

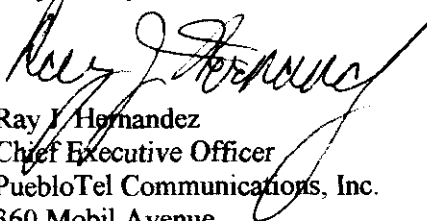
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Date/Initial

As required, PuebloTel affirms the following:

- 1) PuebloTel, via NGT, is transmitting 911 calls to the appropriate PSAP (or other appropriate destinations) using the Selective Router, the trunk lines between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary. PuebloTel, through NGT, is able to provide 911 service in compliance with the rules established in the VoIP 911 Order to 100% of its end user subscribers.
- 2) PuebloTel, via NGT, is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information for 100% of PuebloTel's end-user subscribers.
- 3) PuebloTel has obtained the Registered Location for 100% of its end-user subscribers. PuebloTel obtained this information during the period 9/1/05 – 10/1/05, via email, telephone or by reference to an existing database. PuebloTel's list of Registered Locations for its end-user subscribers is attached.
- 4) PuebloTel has offered its subscribers the ability to update their Registered Locations via email or by calling PuebloTel via their PuebloTel VoIP service.

If you have any questions, please contact the undersigned.

Respectfully,



Ray J. Hernandez
Chief Executive Officer
PuebloTel Communications, Inc.
360 Mobil Avenue
Suite 207
Camarillo, CA 93010
(805) 201-0382



911 Telephone Number/Address Validation Results

Telephone Number	Status	F.N.	Level of Service	Customer Name	Street Number	Suffix	Street Name	Pre-Directional	Suffix/Type	Post-Directional	City	State	Zip	Zip+4
8053223708	Active	78087	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	
8053790211	Active	96948	Enhanced	Eric & Barbara Lott	1648		Hawksway		Ct		Westlake Village	CA	91361	
8052901755	Active	79307	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	
8053223706	Active	25804	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	
8053223707	Active	91100	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	
8053223709	Active	17136	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	
8053224539	Active	51420	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	
8054094746	Active	74211	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	
8054829162	Active	53972	Enhanced	Nati Records	6065		Cielo Vista		Ct		Camarillo	CA	93012	
8056444466	Active	47228	Enhanced	Chuck Sedlacek	3143		Strathmore		Dr		Ventura	CA	93003	
8053823344	Active	74224	Enhanced	JulieAnn Pratt	2243		Martiniqne		Ln		Oxnard	CA	93035	
8053227140	Active	13077	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	
8053227152	Active	82713	Enhanced	PuebloTel Communication	360		Mobil		Ave		Camarillo	CA	93010	
8056853158	Active	43556	Non-Enhanced	West Coast Mortgage	924		Anacapa		Str		Santa Barbara	CA	93101	
8053227153	Active	18339	Enhanced	PuebloTel Communication	360		Mobil		Ave		Camarillo	CA	93010	
8053227150	Active	14222	Enhanced	PuebloTel Communication	360		Mobil		Ave		Camarillo	CA	93010	
7145223441	Active	35345	Enhanced	Rolando Arellano	31		Centerstone		Cir		Buena Park	CA	90620	
8053227149	Active	87502	Enhanced	PuebloTel Communication	360		Mobil		Ave		Camarillo	CA	93010	
8056041700	Active	62762	Enhanced	Linda R. Linedmann	1250		Ostrich Hill		Rd		Oxnard	CA	93035	
8053227151	Active	65076	Enhanced	PuebloTel Communication	360		Mobil		Ave		Camarillo	CA	93010	
8052901450	Active	90244	Enhanced	Daniel Lopez	1113		Carlsbad		Pl		Ventura	CA	93003	
8052010382	Active	23971	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	
8053227141	Active	67656	Enhanced	PuebloTel Comm.	360		Mobil		Ave		Camarillo	CA	93010	